

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHINESE CONSOLIDATED	)	
BENEVOLENT ASSOCIATION,	)	
an Illinois not-for-profit corporation,	)	
	)	Civil Action No: 21-cv-04370
Plaintiff,	)	
v.	)	District Judge Andrea R. Wood
	)	
CHICAGO CHINATOWN BRIDGEPORT	)	Magistrate Judge Maria Valdez
ALLIANCE SERVICE CENTER, an Illinois	)	
not-for-profit corporation and YMAN HUANG	)	
VIEN, individually,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

NOW COME the Defendants Chicago Chinatown Bridgeport Alliance Service Center ("CCBA SC") and Yman Huang Vien ("Vien") (collectively "Defendants"), by and through their attorneys, SmithAmundsen LLC, and pursuant to Federal Rule of Civil Procedure 12(b)(6), move this Honorable Court for entry of an order dismissing Plaintiff, Chinese Consolidated Benevolent Association's ("CCBA") Complaint, *with prejudice*. In support thereof, Defendants submit their and in support thereof, Defendants submit their Memorandum of Law in support of their Motion to Dismiss the Complaint.

WHEREFORE, Defendants, Chicago Chinatown Bridgeport Alliance Service Center and Yman Huang Vien, respectfully request that this Court grant their Motion to Dismiss the Complaint, *with prejudice*, and any further relief deemed proper and just. .

Date: November 23, 2021

Respectfully submitted  
SmithAmundsen LLC

By: /s/ Gary Zhao  
One of the Attorneys for Defendants

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**Certificate of Service**

I hereby certify that on November 23, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

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